

MICHELE BECKWITH  
Acting United States Attorney  
SAM STEFANKI  
Assistant United States Attorney  
501 I Street, Suite 10-100  
Sacramento, CA 95814  
Telephone: (916) 554-2700  
Facsimile: (916) 554-2900

Attorneys for Plaintiff  
United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
DEONTE DESHAWN MORGAN,  
  
Defendant.

CASE NO. 2:25-CR-00132-JAM  
  
STIPULATION AND ~~PROPOSED~~ ORDER  
REGARDING SENSITIVE DISCOVERY  
MATERIAL

**STIPULATION**

Pursuant to Rule 16(d) of the Federal Rules of Criminal Procedure, the United States of America (the “government”) and defendant Deonte Deshawn Morgan (“Morgan” or “the defendant”) stipulate as follows:

1. The government currently possesses discovery material identifying a minor victim in this case (the “Protected Material”). The government desires and intends to produce certain Protected Material to counsel for the defendant.

2. The purpose of this stipulation and requested order is to establish the procedures that must be followed by defense counsel of record, any designated employees, and all other individuals who receive access to this information or these documents in connection with this case.

3. The Protected Material produced in discovery is entrusted to counsel for the defendant only for purposes of representation of Morgan in this case. Counsel for the defendant shall not give the

1 Protected Material to any person other than counsel's staff assisting in litigating this case. The term  
2 "staff" shall explicitly include attorneys, paralegals, and investigators assisting counsel for Morgan in  
3 the present case and exclude any other defendant in this case, or any other pending case against the  
4 defendant, any other counsel hired, retained, or otherwise working on behalf of the defendant, or any  
5 other person other than those specifically described in this paragraph.

6 4. Any person receiving access to the Protected Material from counsel for the defendant  
7 shall be bound by the same obligations as defense counsel and, further, may not give the Protected  
8 Material to anyone.

9 5. If hard copies of the Protected Material are produced or generated, counsel for the  
10 defendant shall not make any copies, duplicates, or recordings of the Protected Material. If hard copies  
11 of the Protected Material are produced or generated, counsel for the defendant may, however, take  
12 written or typed notes summarizing the Protected Material and, if necessary to the litigation of the  
13 instant matter, may have the Protected Material transcribed.

14 6. Counsel for the defendant shall maintain a list of persons to whom any portions or copies  
15 of the Protected Material are being or have been given. Such persons shall be provided with a copy of  
16 this stipulation and proposed order and shall sign their full names to a copy of the stipulation and agree  
17 to be bound by the order and note that they understand its terms and agree to them by signing.

18 7. Counsel for the defendant may use any and all of the Protected Material in the defense of  
19 Morgan in the instant case in any manner deemed essential to adequately represent the defendant (*i.e.*, in  
20 motions that are filed under seal, if necessary; in *ex parte* applications as may be needed; and in  
21 reproducing and summarizing the Protected Material for use in trial preparation summaries, exhibits and  
22 as evidence, as may be needed), consistent with the proposed order as it shall be originally prepared and  
23 signed. In the event defense counsel needs to use the Protected Material in a manner not authorized  
24 under the requested order, counsel shall be entitled to seek to have the order amended by the Court after  
25 giving notice to counsel for the government in a hearing before the Court.

26 8. Counsel for the defendant is authorized to discuss with Morgan the contents of the  
27 Protected Material. Counsel for the defendant and any members of defense counsel's staff, however, are  
28 prohibited from, in any way, giving to the defendant:

- a) Any of the Protected Material itself;
- b) Copies of the Protected Material;
- c) Copies of excerpts of the Protected Material; or
- d) Summaries of the Protected Material.

9. The above prohibition will not extend to the defendant viewing the Protected Material in open court should any of these materials or summaries of these materials be used in the litigation of this case.

IT IS SO STIPULATED.

Dated: June 25, 2025

MICHELE BECKWITH  
Acting United States Attorney

/s/ SAM STEFANKI  
SAM STEFANKI  
Assistant United States Attorney

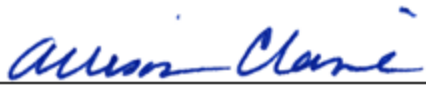
Dated: June 25, 2025

/s/ DOUGLAS BEEVERS  
DOUGLAS BEEVERS  
Counsel for Defendant  
DEONTE DESHAWN MORGAN

**[PROPOSED] ORDER**

Based upon the agreement of the parties and pursuant to Rule 16(d) of the Federal Rules of Criminal Procedure, the Court adopts the proposed stipulation regulating certain discovery in this case. IT IS HEREBY ORDERED that each of the terms described in the stipulation of the parties shall govern the Protected Material as defined in the stipulation in this case.

Dated: June 26, 2025

  
ALLISON CLAIRE  
UNITED STATES MAGISTRATE JUDGE